

Kathleen Baskin, P.E. (Kathleen.Baskin@state.ma.us)
Director of Water Policy and Planning
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA

Re: Public Comments SWMI – Deadline April 6, 2102

Dear Ms. Baskin,

I am writing in response to the Sustainable Water Management Initiative (SWMI) “Framework” proposal of February 3, 2012. The biggest threat to Whitman’s Pond and the Herring Run through Jackson Square is drawdown due to the fact that Whitman’s Pond is in the secondary watershed district of Weymouth. In July 2010, Whitman’s Pond was drawn down dramatically over the course of a few days resulting in thousands of herring fry getting stuck in the ladders and dying. This type of drawdown should never be duplicated. Before the Jackson Square Herring Run becomes a restoration project, it needs to be protected against drawn down and safe yield calculations need to ensure water demands do not negatively impact such a vital ecological resource to the Greater Boston Harbor ecosystem.

I appreciate the tremendous effort that state staff and others have dedicated to the SWMI process. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward. However, serious weaknesses in the proposed SWMI Framework undermine its credibility, negate its effectiveness and thwart truly sustainable water management. These deficiencies must be addressed.

The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. Protecting the rivers that are healthy and restoring those that are not, should be explicit goals of SWMI.

Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows “non-essential” water use when flows are below safe levels. This is not sustainable water management.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from falling below safe levels or being pumped dry; this is unacceptable. We can and must do better. We must seize this once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research.

Thank you for the opportunity to comment.

Sincerely,

G. Michael (Ray) Son
102 Belmont Street
Whitman MA